

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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|--|---|------------------------------|
| AMERITAS LIFE INSURANCE CORP., | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | C.A. No. 1:23-cv-00236 (GBW) |
| | : | |
| WILMINGTON SAVINGS FUND SOCIETY, FSB, SOLELY AS SECURITIES INTERMEDIARY, | : | |
| | : | |
| Defendant. | : | |
| | : | |

**STIPULATION AND [PROPOSED] ORDER REGARDING FORMAT AND
LENGTH OF BRIEFS FOR DISPOSITIVE MOTIONS**

WHEREAS, Plaintiff filed dispositive motions on February 28, 2025 (D.I. 213; D.I. 218).

WHEREAS, Plaintiff filed its supporting briefs, fact statements, and several exhibits provisionally under seal because they contain (or describe) information designated “Confidential” under the Agreed Protective Order (D.I. 18).

WHEREAS, the Court’s Scheduling Order (D.I. 17 ¶ 7) and the Revised Administrative Procedures Governing Filing and Service by Electronic Means (§ G(1)) provide that redacted versions of such filings must be filed within seven days.

WHEREAS, on March 6, 2025, the parties stipulated to extend Plaintiff’s deadline in this regard to March 21, 2025, and, on March 10, 2025, this Court entered an Order granting that stipulation.

WHEREAS, Defendant, in its forthcoming oppositions to Plaintiff's dispositive motions, and Plaintiff, in its forthcoming replies, anticipate significant reference to materials that are designated confidential, and thus both parties anticipate filing additional materials provisionally under seal.

WHEREAS, given the volume of materials designated confidential, and the desire to confer regarding which materials should be maintained under seal, the parties agree good cause exists to set a combined deadline for all parties to file their respective public versions of summary judgment materials (*i.e.*, opening materials, answering materials, and reply materials), thirty (30) days from the close of briefing.

IT IS HEREBY STIPULATED AND AGREED, by the parties hereto, through their undersigned counsel, and subject to the approval of the Court, that both parties shall file public versions of their opening, answering, and reply materials regarding Plaintiff's dispositive motions (D.I. 213; D.I. 218) no later than thirty (30) days after reply briefs are submitted.

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Dated: March 21, 2025

SO ORDERED this 24th day of March, 2025


The Honorable Gregory B. Williams